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United States Department of Justice
Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

J. DESHAWN TORRENCE,

Defendant.

CASE NO. 1:22-CR-00207-JLT-SKO

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: May 3, 2023
TIME: 1:00 p.m.
COURT: Hon. Sheila K. Oberto

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a status conference on May 3, 2023.
2. By this stipulation, defendant now moves to continue the status conference until July 5, 2023, and to exclude time between May 3, 2023, and July 5, 2023, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case

1 consists of over 80,000 pages of material and includes investigative reports, recordings,
2 photographs, text messages, search warrants, and other items produced in electronic form. The
3 government has represented to the defense that its investigation is ongoing. In addition, a plea
4 offer has been sent to the defense.

5 b) Counsel for defendant requires additional time to review the discovery material
6 and consult with his client.

7 c) Counsel for defendant believes that failure to grant the above-requested
8 continuance would deny them the reasonable time necessary for effective preparation, taking into
9 account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendant in a trial within the
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of May 3, 2023 to July 5, 2023,
16 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
17 because it results from a continuance granted by the Court at defendant's request on the basis of
18 the Court's finding that the ends of justice served by taking such action outweigh the best interest
19 of the public and the defendants in a speedy trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
22 must commence.

23 IT IS SO STIPULATED.

24 Dated: April 25, 2023

25 PHILLIP A. TALBERT
United States Attorney

26
27 /s/ KAREN A. ESCOBAR
KAREN A. ESCOBAR
28 Assistant United States Attorney

1 Dated: April 25, 2023

KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division

2
3 /s/ MICHAEL J. SONGER
MICHAEL J. SONGER
4 Trial Attorney
U.S. Department of Justice
5 Criminal Section, Civil Rights Division

6 Dated: April 25, 2023

7 /s/ Roger D. Wilson
8 ROGER D. WILSON
9 Counsel for Defendant J. DeShawn Torrence

10
11
12 **ORDER**

13 IT IS SO ORDERED.

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16 DATED: 4/27/2023

17 *Sheila K. Oberto*
18 THE HONORABLE SHEILA K. OBERTO
19 UNITED STATES MAGISTRATE JUDGE
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